



DAVIS KUELTHAU

attorneys at law

2012 DEC 27 PM 11:10

OFFICE 27

December 21, 2012

**VIA OVERNIGHT DELIVERY**

Anthony Herman, Esq.  
Office of General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 6692 (Ryan for Congress)

Dear Mr. Herman:

Please find enclosed the Response on behalf of Ryan for Congress to the Complaint filed by the Democratic Party of Wisconsin (DPW) and designated as Matter Under Review 6692. The following documents are submitted and included in the Response:

1. Response of Ryan for Congress submitted by Holtzman Vogel Josefiak PLLC dated December 20, 2012, which contains the following attachments incorporated therein:
  - Ryan for Congress Amended 2012 October Quarterly Report (relevant pages); and
  - Affidavit of Paul J. Mair, Ryan for Congress Treasurer
2. Statement of Designation of Counsel by Holtzman Vogel Josefiak PLLC on behalf of Respondent Ryan for Congress.
3. Statement of Designation of Counsel by Holtzman Vogel Josefiak PLLC on behalf of Respondent Paul J. Mair.

Also enclosed is one complete copy of this letter and the above-referenced documents. If possible, please file-stamp the copies and return the same to me in the enclosed, self-addressed postage pre-paid envelope.

As more fully set forth in the Response, DPW's Complaint is entirely without merit, and we respectfully request that the Complaint be dismissed as soon as possible.

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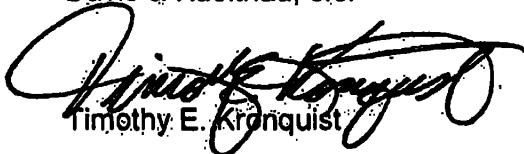
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Anthony Herman, Esq.  
December 21, 2012  
Page 2

Upon review, if you have any questions, please do not hesitate to contact me.

Very truly yours,

Davis & Kuelthau, s.c.



Timothy E. Kronquist

TEK:bak  
Enclosures

cc: Paul J. Mair, Treasurer (via electronic mail)

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# HOLTZMAN VOGEL JOSEFIK PLLC

*Attorneys at Law*

45 North Hill Drive  
Suite 100  
Warrenton, VA 20186  
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December 20, 2012

Anthony Herman, Esq.  
Office of General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

***Re: Matter Under Review 6692 (Ryan for Congress)***

Dear Mr. Herman,

This Response is submitted by the undersigned counsel on behalf of Ryan for Congress (RFC), in response to the complaint filed by The Democratic Party of Wisconsin (DPW), and designated as Matter Under Review 6692.

DPW contends that RFC's 2012 Republican National Convention (Convention) expenses were improperly characterized as RFC expenses. This legal conclusion, however, is based on nothing more than the acknowledged fact that Congressman Ryan's Congressional Campaign made disbursements for expenses incurred at the Convention. The Complainant provides no evidence whatsoever that actually shows that any RFC disbursements were made, used, or transferred to any other campaign committee. Rather, the Complainant simply asserts that "these were expenses clearly meant to promote Mr. Ryan's candidacy for Vice President."

Both Ryan for Congress and Romney For President were fully aware of legal requirements pertaining to the proper payment of campaign expenses. The Complainant either fails to acknowledge, or is unaware, that Romney for President did in fact reimburse RFC for expenses incurred at the Tampa Marriott Waterside that were attributable to activities in furtherance of the Presidential Campaign.

As is more fully explained below, RFC funds were properly and exclusively used for the benefit of Congressman Ryan's Congressional Campaign, and that Committee fully complied with all relevant legal obligations. This Complaint should be quickly dismissed.

*Response of Ryan for Congress in MUR 6692*  
*Page 1 of 7*

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**I. Applicable Legal Standard and Commission Precedent**

FEC regulations address this situation in which an individual runs for more than one federal office at a time. Specifically, 11 CFR 110.8(d)(1) requires "an individual [who] is a candidate for more than one Federal office . . . [to] designate separate principal campaign committees and establish completely separate campaign organizations." Further, "[n]o funds, goods, or services, including loans and loan guarantees, may be transferred between or used by the separate campaigns, except as provided in 11 CFR 110.3(c)(5)." 11 CFR 110.8(d)(2). The Commission's previous treatment of applicable regulations makes clear that RFC is in full compliance with the law. See Advisory Opinion 1995-3 (Gramm) at 2 ("The Act and Commission regulations contemplate that a person may maintain concurrent candidacies for two separate Federal offices. . . . Commission regulations allow dual campaigns to share personnel and facilities as long as expenditures are allocated between the two campaigns and payments made from each campaign account reflect the allocation.").

The Commission has repeatedly "reaffirm[ed] its long-standing opinion that candidates have wide discretion over the use of campaign funds."<sup>1</sup> Further, it is also well-established that campaign funds may be used for expenses incurred in connection with activities in furtherance of that campaign or that are undertaken by campaign representatives performing important functions related to that campaign or a candidate's duties as a Federal officeholder. See, e.g., Advisory Opinions 1996-20 (Lucas), 1996-19 (Walsh), and 1995-47 (Underwood). In Advisory Opinion 1996-20 (Lucas), the Commission concluded that the campaign committee of a Federal officeholder may pay convention travel and subsistence expenses of the officeholder's congressional chief of staff because he would perform "important functions related to" the campaign as well as "functions that relate to [the candidate's] duties as a Federal officeholder." AO 1996-20 (Lucas) at 2. These "important functions" included raising contributions, procuring vendor services for campaign functions, liaison activities with congressional office staff, and attendance at policy briefings. *Id.*

In Advisory Opinion 1996-19 (Walsh), the Commission explained that a candidate's campaign committee may pay travel and subsistence expenses of the candidate's wife and children for various activities that the candidate stated would "enhance [his] re-election effort" and that were "in furtherance of [his] campaign for reelection." AO 1996-19 (Walsh) at 2. The activities contemplated by the Commission included attendance and representation of the candidate at receptions, press conferences, and fundraising events and meetings for the purpose

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<sup>1</sup> Final Rule on Personal Use of Campaign Funds, 60 Fed. Reg. 7862, 7867 (February 9, 1995). The Commission specifically explained that travel and subsistence expenses may be paid from campaign funds where "the candidate can reasonably show that the expenses at issue resulted from campaign or officeholder activities. . ." *Id.*

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of "maintain[ing] contacts and goodwill" with potential contributors and communicating with constituents about the campaign. *Id.* The Commission reached the same conclusion in Advisory Opinion 1995-47 (Underwood) where the candidate explained that his wife's attendance at similar convention events was "important" to the campaign and that it would "enhance [his] re-election effort." AO 1995-47 (Underwood) at 3.

Further, the Commission previously recognized that federal officeholders who attend a national convention have various responsibilities and obligations, and that attending to these responsibilities and obligations is a proper use of campaign funds. See AO 1996-20 (Lucas) at 3 ("The Commission notes that you will be attending the convention as a delegate, that you are an officeholder, and that, due to the purpose and nature of a national party convention, there will be meetings and activities aimed at supporting the party's presidential nominee. Since it is expected that a person who attends the convention as a delegate and officeholder would participate in such meetings and activities as a natural extension of such status, the activities of you and your [Chief of Staff] with respect to your function in the Dole campaign will not result in a contribution by the Lucas Committee to the Dole campaign.").

The use of RFC funds in furtherance of Congressman Ryan's Congressional Campaign was entirely permissible and consistent with the "wide discretion" afforded to a candidate's use of campaign funds. The Complainant has provided no evidence that any RFC funds were misused or improperly spent.

## **II. "Reason To Believe" Standard**

The Commission previously explained:

The Commission will make a determination of 'no reason to believe' a violation has occurred when the available information does not provide a basis for proceeding with the matter. The Commission finds 'no reason to believe' when the complaint, any response filed by the respondent, and any publicly available information, when taken together, fail to give rise to a reasonable inference that a violation has occurred, or even if the allegations were true, would not constitute a violation of the law. For example, a 'no reason to believe' finding would be appropriate when:

- A violation has been alleged, but the respondent's response or other evidence convincingly demonstrates that no violation has occurred;
- A complaint alleges a violation but is either not credible or is so vague that an investigation would be effectively impossible; or
- A complaint fails to describe a violation of the Act.

Statement of Policy Regarding Commission Action in Matters at the Initial Stage in the Enforcement Process, 72 Fed. Reg. 12,545, 12,546 (March 16, 2007).

"'Reason to believe' is a threshold determination that by itself does not establish that the law has been violated. In fact, 'reason to believe' determinations indicate only that the Commission found sufficient legal justification to open an investigation to determine whether there is probable cause to believe that a violation of the Act has occurred." Statement of Reasons of Commissioners Bauerly and Weintraub in MUR 6056 (Protect Colorado Jobs, Inc.) at 2.

"In order for the Commission to determine that a complaint provides a reason to believe a violation occurred, the complainant, under penalty of perjury, must provide specific facts from reliable sources that a respondent fails to adequately refute." Statement of Reasons of Vice Chairman Petersen and Commissioners Hunter and McGahn in MUR 6056 (Protect Colorado Jobs, Inc.) at 6.

"Unwarranted legal conclusions from asserted facts ..., or mere speculation ... will not be accepted as true. In addition, while credibility will not be weighed in favor of the complainant or the respondent, a complaint may be dismissed if it consists of factual allegations that are refuted with sufficiently compelling evidence provided in the response to the complaint ... [P]urely speculative charges, especially when accompanied by a direct refutation, do not form an adequate basis to find reason to believe that a violation of the FECA has occurred." Statement of Reasons of Commissioners Mason, Sandstrom, Smith, and Thomas in MUR 4960 (Hillary Clinton) at 2-3.<sup>2</sup> "[M]ere 'official curiosity' will not suffice as the basis for FEC investigations." *FEC v. Machinists Non-Partisan League*, 655 F.2d 380, 388 (D.C. Cir. 1981).

"[U]nder the Act, before making a reason to believe determination, the Commission must assess both the law and the credibility of the facts alleged. To do so, the Commission must identify the sources of information and examine the facts and reliability of those sources to determine whether they 'reasonably [give] rise to a belief in the truth of the allegations presented.' Only once this standard is met may the Commission investigate whether a violation occurred." Statement of Reasons of Vice Chair Hunter and Commissioners McGahn and Petersen in MUR 6296 (Kenneth Buck) at 5-6

<sup>2</sup> See also Statement of Reasons of Vice Chair Hunter and Commissioners McGahn and Petersen in MUR 6296 (Kenneth Buck) at 6 ("As in MUR 4960 (Hillary Clinton), the complaint in this matter lacked specific facts to establish that Buck, his authorized committee, and Morgensen violated the Act. Instead, the complaint was based 'upon information and belief,' a phrase that appears at least once on every page. None of the allegations were based on personal knowledge and, with two exceptions, the complaint does not identify any source for its allegations, credible or otherwise. Moreover, Respondents sufficiently refuted the factual allegations made in the complaint. Thus, the Commission is required under the statute and its own regulations to find no reason to believe Respondents violated the Act.").

As is discussed in more detail below, DPW's allegations warrant a "no reason to believe" finding and should be dismissed. The information that DPW would characterize as evidence is nothing more than citation to the expenses incurred by RFC for hotel rooms. DPW speculates that this amount alone supports their allegation of improper use of RFC funds.

### **III. RFC's 2012 National Convention Expenses**

Congressman Ryan's availability to personally attend formal and informal Convention events and receptions with Wisconsin delegates, his constituents, and other national and prominent Republican supporters, policy-makers, and commentators in support of his congressional campaign was severely limited not only by the rigors of his vice presidential campaign duties but also by Secret Service detail constraints. As a result, RFC relied heavily on RFC staff and volunteers to engage in significant activities in furtherance, and on behalf of, Congressman Ryan's campaign for re-election to the U.S. House of Representatives.

The Commission has been clear in stating that campaign funds may be used for expenses incurred in connection with activities in furtherance of that campaign or that are undertaken by campaign representatives performing important functions related to that campaign or a candidate's duties as a Federal officeholder. See Advisory Opinions 1996-20 (Lucas) at 2 (permitting campaign committee payment for performance of "important campaign functions" and "functions that relate to [] duties as a Federal officeholder."); 1996-19 (Walsh) at 2 (permitting campaign committee payment for performance of "activities that are in furtherance of" and that would "enhance [the candidate's] re-election effort."); and 1995-47 (Underwood) at 3 (permitting campaign committee payment for performance of "activities that are in furtherance of" and that would "enhance [the candidate's] re-election effort."). Further, candidates are afforded "wide discretion" in determining campaign related expenses. Final Rule on Personal Use of Campaign Funds, 60 Fed. Reg. at 7867.

DPW's position rests entirely on its assertion that "[i]t strains credulity to believe that twenty rooms paid for by [RFC] at the [] Convention were expended solely to promote the re-election of Mr. Ryan to the House of Representatives." Complaint at 2. Without providing any factual or logical bridge to a conclusion, DPW states that these hotel expenses were "clearly meant to promote Congressman Ryan's candidacy for Vice President." *Id.* Both assertions are simply unsupported conclusions. The Complaint does not identify any transactions that it believes were "clearly meant to promote Congressman Ryan's candidacy for Vice President" or otherwise provide any support for its legal conclusions.

In addition, the Complainant does not acknowledge that Romney for President appropriately reimbursed RFC for certain costs that were initially incurred by RFC. RFC's

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Amended 2012 October Quarterly Report reflects that RFC received \$2,768.38 from Romney for President on September 29, 2012. RFC Amended 2012 October Quarterly Report at 1205 (*relevant pages attached*). The notation below this itemized receipt reads: "Reimbursed/ room paid to Marriott Waterside." *Id.* As explained by RFC's Treasurer, this reimbursement "is an accurate reflection of the extent to which [Romney for President] made use of RFC's Tampa Marriott Waterside accommodation in furtherance of the Presidential Campaign." Affidavit of Paul J. Mair (*attached*). Thus, both RFC and Romney for President were aware of their obligation to use each campaign's funds for expenses incurred in furtherance of that particular campaign. Further, the accounting practices of each committee evidence full comprehension of and compliance with applicable regulations. See Advisory Opinion 1995-3 (Gramm) at 2 ("Commission regulations allow dual campaigns to share personnel and facilities as long as expenditures are allocated between the two campaigns and payments made from each campaign account reflect the allocation.").

The Complaint also cites an online piece in a blog, *Politicker.com*, that was obviously the basis for this Complaint. The legal conclusions offered in the Complaint echo the quoted comments of Jerry Goldfeder, a well-known *Democratic* campaign finance and election attorney. Based on the same limited facts alleged in the Complaint, Mr. Goldfeder offered his opinion that "It sounds as if he used congressional campaign funds for national campaign purposes and that's highly problematic." <http://politicker.com/2012/10/paul-ryan-campaign-money/>, (October 25, 2012) (*Politicker Article*) at 3. Mr. Goldfeder is certainly free to assist bloggers in creating pieces to serve as FEC complaint fodder, but it seems fairly obvious that his opinion in this matter was not fully informed. Complaint at 1, 2 *citing* *Politicker Article*.

The *Politicker* piece claims that "[t]he vast majority of Mr. Ryan's convention spending does not seem to be related to these [RFC] events." *Politicker Article* at 2. Whether the reported disbursements in question were "related" to two formal events is entirely irrelevant. RFC was not limited to spending funds solely and directly on two announced events, and the Complainant does not identify a single improper transaction. Rather, the Complainant essentially asks the Commission to investigate the matter in the hopes that an actual violation will emerge. Needless to say, this is not how the complaint process works.

The Complaint also references an RFC spokesman's comment that rooms reserved at the Marriott were to accommodate those wishing to see Congressman Ryan's keynote address and that hotel policy required a five-night minimum stay. Assuming this was the case for some individuals who attended, Congressman Ryan gave his keynote address at the Convention while he was a sitting Member of Congress simultaneously running for re-election to that position. Campaigns are entirely free to spend funds on their supporters in a manner that is related to the campaign. And, as noted above, the Complainant has not provided any "specific facts"



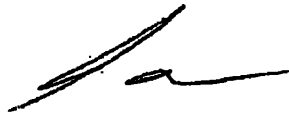
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demonstrating that any of these persons performed any work or services for the Romney-Ryan presidential campaign. Further, Romney for President's reimbursement for its use of RFC-reserved accommodation at the Tampa Marriott Waterside clearly shows that these campaigns were aware of, and in full compliance with, their individual obligations.

**V. Conclusion**

DPW's complaint is based entirely on speculation and should be dismissed as soon as reasonably possible.

Sincerely,



Jason Torchinsky  
Michael Bayes  
Christopher Winkelman  
Counsel to Ryan for Congress

Enclosures: Affidavit of Paul J. Mair  
RFC Amended October 2012 Quarterly Report (*relevant pages only*)

Image# 12961300487

FEC  
FORM 3REPORT OF RECEIPTS  
AND DISBURSEMENTS  
For An Authorized Committee

Office Use Only

1. NAME OF  
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type  
over the lines.

1-2FE4M5

Ryan for Congress

ADDRESS (number and street)

PO Box 1488

Check if different  
than previously  
reported. (ACC)

Janesville

WI

53547-1488

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

STATE ▼ DISTRICT

C C00330894

3. IS THIS  
REPORTNEW  
(N)

OR

AMENDED  
(A)

WI

01

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:



April 15 Quarterly Report (Q1)



July 15 Quarterly Report (Q2)



October 15 Quarterly Report (Q3)



January 31 Year-End Report (YE)



Termination Report (TER)

(b) 12-Day PRE-Election Report for the:



Primary (12P)



General (12G)



Runoff (12R)



Convention (12C)



Special (12S)

Election on

M M / D D / Y Y Y Y

in the  
State of

M M / D D / Y Y Y Y

(c) 30-Day POST-Election Report for the:



General (30G)



Runoff (30R)



Special (30S)

Election on

M M / D D / Y Y Y Y

in the  
State of

M M / D D / Y Y Y Y

5. Covering Period

M M / D D / Y Y Y Y  
07 / 26 / 2012

through

M M / D D / Y Y Y Y  
08 / 30 / 2012

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Paul J Mair

Signature of Treasurer

Paul J Mair

[Electronically Filed]

Date

M M / D D / Y Y Y Y  
11 / 30 / 2012

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office  
Use  
OnlyFEC FORM 3  
(Revised 02/2003)

FESAN018

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# SUMMARY PAGE

of Receipts and Disbursements

FEC Form 3 (Revised 02/2003)

PAGE 2 / 1284

Write or Type Committee Name  
 Ryan for Congress

Report Covering the Period:

From:

 M M M D D Y Y Y Y Y  
 07 26 2012

To:

 M M M D D Y Y Y Y Y  
 09 30 2012

	COLUMN A This Period	COLUMN B Election Cycle-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e)) ....	460081.79	4706301.18
(b) Total Contribution Refunds (from Line 20(d)) .....	5000	8725
(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a)) .....	455081.79	4697576.18
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17) .....	1878398.44	3845901.85
(b) Total Offsets to Operating Expenditures (from Line 14) .....	0	1507.64
(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a)) .....	1878398.44	3844394.21
8. Cash on Hand at Close of Reporting Period (from Line 27) .....	4002680.37	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) .....	0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) .....	0	

For further information contact:

Federal Election Commission  
 999 E Street, NW  
 Washington, DC 20463

Toll Free 800-424-9530  
 Local 202-694-1100

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# **DETAILED SUMMARY PAGE** of Receipts

PAGE 3 / 1264

FEC Form 3 (Revised 12/2003)

Write or Type Committee Name

Ryan for Congress

Report Covering the Period:

From:

MM	DD	YYYY
07	26	2012

To:

MM	DD	YYYY
09	30	2012

**I. RECEIPTS**
**COLUMN A**  
Total This Period

**COLUMN B**  
Election Cycle-to-Date
**11. CONTRIBUTIONS (other than loans) FROM:****(a) Individuals/Persons Other Than Political Committees****(i) Itemized (use Schedule A) .....**

315155.98

2893501.23

**(ii) Unitemized .....**

0

641899.95

**(iii) TOTAL of contributions from individuals .....**

315155.98

3535401.18

**(b) Political Party Committees .....**

0

0

**(c) Other Political Committees (such as PACs) .....**

144905.81

1170900

**(d) The Candidate .....**

0

0

**(e) TOTAL CONTRIBUTIONS (other than loans) (add Lines 11(a)(iii), (b), (c), and (d)) ..**

480061.79

4706301.18

**12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES .....**

0

158504.57

**13. LOANS:****(a) Made or Guaranteed by the Candidate .....**

0

0

**(b) All Other Loans .....**

0

0

**(c) TOTAL LOANS (add Lines 13(a) and (b)) .....**

0

0

**14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) .....**

0

1507.64

**15. OTHER RECEIPTS (Dividends, Interest, etc.) .....**

5583.23

38692.08

**16. TOTAL RECEIPTS (add Lines 11(e), 12, 13(c), 14, and 15) (Carry Total to Line 24, page 4) .....**

485645.02

4905005.47

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# **DETAILED SUMMARY PAGE** of Disbursements

FEC Form 3 (Revised 02/2003)

PAGE 4 / 1264

**II. DISBURSEMENTS**
**COLUMN A**  
Total This Period

**COLUMN B**  
Election Cycle-to-Date

17. OPERATING EXPENDITURES.....

1876398.44

3845901.85

18. TRANSFERS TO OTHER  
AUTHORIZED COMMITTEES.....

0

0

19. LOAN REPAYMENTS:

(a) Of Loans Made or Guaranteed  
by the Candidate.....

0

0

(b) Of All Other Loans.....

0

0

(c) TOTAL LOAN REPAYMENTS  
(add Lines 19(a) and (b)).....

0

0

20. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other  
Than Political Committees.....

5000

7725

(b) Political Party Committees.....

0

0

(c) Other Political Committees  
(such as PACs).....

0

1008

(d) TOTAL CONTRIBUTION REFUNDS  
(add Lines 20(a), (b), and (c)).....

5000

8725

21. OTHER DISBURSEMENTS.....

0

111000

22. TOTAL DISBURSEMENTS  
(add Lines 17, 18, 19(c), 20(d), and 21) ►

1881398.44

3985626.85

**III. CASH SUMMARY**

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD.....

5418413.79

24. TOTAL RECEIPTS THIS PERIOD (from Line 16, page 3).....

485645.02

25. SUBTOTAL (add Line 23 and Line 24).....

5884058.81

26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22).....

1881398.44

27. CASH ON HAND AT CLOSE OF REPORTING PERIOD  
(subtract Line 26 from Line 25).....

4002660.37

13044344367

# **SCHEDULE A (FEC Form 3)** **ITEMIZED RECEIPTS**

Use separate schedule(s)  
for each category of the  
Detailed Summary Page.

FOR LINE NUMBER: **PAGE 1205 OF 1264**

(check only one)

☐ 11a ☐ 11b ☐ 11c ☐ 11d  
☐ 12 ☐ 13a ☐ 13b ☐ 14 ☒ 15

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)  
**Ryan for Congress**

Full Name (Last, First, Middle Initial)  
**Waukesha State Bank**

**A.** Mailing Address **151 E Saint Paul Avenue**

City State Zip Code  
**Waukesha WI 53188-3701**

FEC ID number of contributing  
federal political committee.

**C**

Name of Employer

Occupation

Receipt For: 2012

☒ Primary ☐ General  
☐ Other (specify)

Election Cycle-to-Date

**449.65**

Date of Receipt

**07 / 31 / 2012**

Transaction ID : **A-M114822**

Amount of Each Receipt this Period

**41.15**

Money Market Interest

Full Name (Last, First, Middle Initial)  
**Commercial Bank**

**B.** Mailing Address **1400 Black bridge Rd.**

City State Zip Code  
**Janesville WI 53546**

FEC ID number of contributing  
federal political committee.

**C**

Name of Employer

Occupation

Receipt For: 2012

☐ Primary ☒ General  
☐ Other (specify)

Election Cycle-to-Date

**1575.42**

Date of Receipt

**09 / 17 / 2012**

Transaction ID : **A-M117534**

Amount of Each Receipt this Period

**104.47**

Money Market Interest

Full Name (Last, First, Middle Initial)  
**Romney For President Inc.**

**C.** Mailing Address **585 Commercial Street**

City State Zip Code  
**Boston MA 02108-1024**

FEC ID number of contributing  
federal political committee.

**C** **C00431171**

Name of Employer

Occupation

Receipt For: 2012

☐ Primary ☒ General  
☐ Other (specify)

Election Cycle-to-Date

**2768.38**

Date of Receipt

**09 / 27 / 2012**

Transaction ID : **A-M117632**

Amount of Each Receipt this Period

**2768.38**

Reimbursed/ room paid to Marriott Waters

**SUBTOTAL** of Receipts This Page (optional) .....

**2914.00**

**TOTAL** This Period (last page this line number only) .....

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# STATEMENT OF DESIGNATION OF COUNSEL

Please use one form for each respondent

MUR: 6692 (Ryan for Congress)

NAME OF COUNSEL: Jason Torchinsky  
Michael Bayes  
Christopher Winkelman

FIRM: HOLTZMANVOGELJOSEFIK PLLC

ADDRESS: 45 North Hill Drive  
Suite 100  
Warrenton, VA 20186

TELEPHONE: (540) 341-8808  
FAX: (540) 341-8809

The above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Paul J. Malr  
Print Name

12/13/12  
Date

Paul J. Malr  
Signature

Treasurer, Ryan for Congress  
Title

Respondents' Name: Ryan for Congress

Address: PO Box 1488  
Janesville, WI 53547

Business: (540) 341-8808

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# STATEMENT OF DESIGNATION OF COUNSEL

Please use one form for each respondent

MUR: 6692 (Ryan for Congress)

NAME OF COUNSEL: Jason Torchinsky  
Michael Bayes  
Christopher Winkelman

FIRM: HOLTZMANVOGELJOSEFIK PLLC

ADDRESS: 45 North Hill Drive  
Suite 100  
Warrenton, VA 20186

TELEPHONE: (540) 341-8808  
FAX: (540) 341-8809

The above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

Paul J. Mair  
Print Name

12/13/12      Paul J. Mair      Treasurer, Ryan for Congress  
Date      Signature      Title

Respondents' Name: Paul J. Mair

Address: PO Box 1488  
Janesville, WI 53547

Business: (540) 341-8808

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